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**From:** Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Sent:** 5/4/2021 2:30:23 PM  
**To:** Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]  
**Subject:** FW: PFAS at June 7-8 Full SFIREG Mtg

Definition issue on the agenda for SFIREG (and SFIREG walk through). Heads up. I'll add SFIREG to the list of discussions for tomorrow's 9:00.

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**From:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Sent:** Tuesday, May 4, 2021 9:24 AM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>  
**Subject:** PFAS at June 7-8 Full SFIREG Mtg

Good morning Kimberly, Thuy, Yaorong, Shamus, and Rhina

At the upcoming June 7-8 Full SFIREG meeting, PFAS will again be a topic and I wanted to highlight the topic as listed in the current draft agenda. Good news is that it's a much shorter session, from 12:45 – 1:15 and SFIREG has provided a little more info. on what they're hoping to hear about/discuss. SFIREG has also taken the liberty of identifying Kimberly for the session, and we can update this as needed. Expectations for the sessions will be discussed at today's 2 PM walk-through meeting.

Notably, they've included hearing about responses to unanswered questions from the April SIFREG Joint Working Committee meeting. SFIREG has forwarded me those questions with the answers provided (according to their notes) at the April meeting. I've pasted those below the PFAS agenda topic below. At today's OCSPP/OECA PFAS Check-in, I'll likely inquire as to the status of these responses.

No immediate request at this point, just an FYI so we're all in the loop. Please let me know if anyone may have any questions.

**PFAS Topic at June 7-8 Full SFIREG meeting:**

12:45 pm

**PFAS and Pesticide Products**

- *EPA OPP will discuss PFAS and pesticide products, registrations, regulations, stop sale issues, working with SLAs and industry, fluorinated high-density polyethylene (HDPE) containers, laboratory testing, definitions, EPA master and inert lists, and the response to the April JWC questions.* [EPA Kimberly Nesci, EPA/OPP/BEAD, SFIREG Representatives]

**Remaining PFAS Questions from April SFIREG JWC Meeting (and SFIREG's notes on EPA response):**

What is the definition of a PFAS compound in the context of pesticides?

Catherine Aubee/ OPP Registration Division- Many different definitions of PFAS. Working internally within EPA to see if they can all get on the same page regarding what PFAS is in the context of a pesticide. No official definition

What containers are being purchased off the open market for additional testing by BEAD/Ft. Meade and are they the same level of fluorination as the initial container rinsate testing?

Containers were purchased off the open market not knowing the fluorination levels. Some list having 5 levels some up to 9 levels. Proprietary CBI on what the levels of fluorination mean. Right now Ft. Meade is doing rinsate studies, but have purchased enough for leaching studies

If not, is there reason similar containers are not being used to perform the leaching studies?

Not answered

According to the EPA PFAS Master List, comprising a master list of PFAS chemicals, [https://comptox.epa.gov/dashboard/chemical\\_lists/pfasmaster](https://comptox.epa.gov/dashboard/chemical_lists/pfasmaster) several pesticide active ingredients such as Lufenuron, Noviflumuron, Tetraconazole, Pyrifluquinazon are listed as PFAS chemicals, however the webpage states that there is no clear definition of PFAS chemical. An excerpt from the webpage :“There is no precisely clear definition of what constitutes a PFAS substance given the inclusion of partially fluorinated substances, polymers, and ill-defined reaction products on these various lists. Hence, PFASMASTER serves as a consolidated list of substances spanning and bounded by the below lists, defining a practical boundary of PFAS chemical space (within DSSTox) of current interest to researchers and regulators worldwide. This PFAS Master List will continue to expand as component lists grow. (Last Updated: September 16th 2020)”. Are the active ingredients listed actually PFAS chemicals?

Will need to get back to us. Are these PFAS or not?- Still looking into it, trying to come up with a good chemical definition to decide which would be a PFAS

Definitely fluorinated pesticides out there, EPA determined they aren't longer chain, although they might meet someone else's definition of PFAS, but EPA has done risk assessments.

EPA has indicated a “clean up” of PFAS in the Pesticide Inert Finder database as the database includes some PFAS compounds. EPA further indicated that even though these compounds were listed, they do not occur in currently registered pesticide products (this was information relayed in a presentation to Massachusetts mosquito control districts earlier this year). Could an update be given on the effort to clean up the inert database?

Continues to update legacy databases of chemicals not currently in use, whether considered PFAS or not.

Kerry Leifer- PFAS shined a light on the need to clean-up the database, but it is all chemicals not currently in use.

Are there continued considerations being given regarding SLA laboratories providing analytical support? If so, what are they?

Actively communicating with states and state labs and are encouraging labs to reach out to BEAD for EPA requirements.

Thuy- will definitely need help in the future as more product testing happens. Labs can contact Thuy and will help state labs set up the method once validated. Method is validated at the ppb level but not the ppt level. Might drop the low end to 50 ppt. Works well at 100 ppt. Kimberly does not have anything to share about level of concerns. Has not explored other commodities at other levels at this point. Can't provide information on residue on commodities

Will affected products be placed under Stop Sale/Stop Use by EPA or State Lead Agencies?

EPA no comment at this time

Will there be a similar response from EPA regarding Permanone 30-30?

Discontinue use and hold those container, specific to Anvil 10+10

EPA Received data from PEER on Permanone 30-30 which it is reviewing and actively pursuing getting containers, but has no information about the containers being fluorinated. The info EPA has is that they are steel containers with a plastic tops.

What consideration, if any, is being given to pesticide container recycling programs in regards to the fluorinated HDPE containers?

EPA Will have to get back to us. Working on final response.

Thanks,

*Sandra O'Neill*

919 323 7926

-----Original Appointment-----

**From:** O'Neill, Sandra

**Sent:** Wednesday, April 28, 2021 4:54 PM

**To:** O'Neill, Sandra; Picone, Kaitlin; Hopkins, Yvette; Echeverria, Marietta; Goodis, Michael; Matuszko, Jan; Messina, Edward; Nesci, Kimberly; Pease, Anita; Reaves, Elissa; Smith, Charles; Vogel, Dana; Akerman, Gregory; Anderson, Brian; Anderson, Neil; Aubee, Catherine; Christ, Lisa; Kiely, Timothy; Overstreet, Anne; Rosenblatt, Daniel; Weiss, Steven; Wilbur, Donald; Barber, Delores; Mosby, Jackie; Nguyen, Thuy; Teter, Royan; Ambrosino, Helene; Miederhoff, Eric; Amy Sullivan; Jones, Patrick; [GBahr@agr.wa.gov](mailto:GBahr@agr.wa.gov); Rogers, Jeffrey; Wijnja, Hotze (AGR); Liza Fleeson; Engle, Kelly

**Cc:** Bellot, Michael; Vizard, Elizabeth; Schroeder, Carolyn; Kyprianou, Rose; Hathaway, Margaret; Kelly Tindall ([tindall.kelly@epa.gov](mailto:tindall.kelly@epa.gov)); Maignan, Tawanda; Willis, Kristen; Lloyd, Matthew; Halpert, Daniel; Friedman, Dana

**Subject:** Walk-through for the June 7-8 Full SFIREG Mtg

**When:** Tuesday, May 4, 2021 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

5/4/21: attached draft agenda

Greetings All,

Please find information on the upcoming "Walk-Through" for the June 7-8 Full SFIREG Mtg. SFIREG is drafting the agenda and it will be attached in advance of the walk-through:

- Purpose: The State FIFRA Issues Research and Evaluation Group (SFIREG) Chair will give OCSPP/OECA leadership an overview of the agenda topics for the SFIREG meeting taking place on June 7-8, 2021. This meeting will serve as an opportunity for OCSPP and OECA to ask questions regarding meeting expectations.
- Additional information about SFIREG can be found at the following Web address:  
<https://aapco.org/2015/07/30/sfireg-3/>
- OPS Contact: Sandra O'Neill, Yvette Hopkins

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